

1 Amy P. Lally (SBN 198555)
2 alally@sidley.com
3 Ellyce R. Cooper (SBN 204453)
4 ecooper@sidley.com
5 SIDLEY AUSTIN LLP
6 1999 Avenue of the Stars, 17th Floor
7 Los Angeles, CA 90067
8 Telephone: +1 310 595-9500
9 Facsimile: +1 310 595-9501

10 Mark Rosenbaum (SBN 59940)
11 mrosenbaum@publiccounsel.org
12 Judy London (SBN 149431)
13 jlondon@publiccounsel.org
14 Talia Inlender (SBN 253796)
15 tinlender@publiccounsel.org
16 Amanda Savage (SBN 325996)
17 asavage@publiccounsel.org)
18 Lucero Chavez (SBN 273531)
19 lchavez@publiccounsel.org
20 PUBLIC COUNSEL
21 610 S. Ardmore Avenue
22 Los Angeles, CA 90005
23 Telephone: +1 213 385-2977
24 Facsimile: +1 213 385-9089

25 *Attorneys for Plaintiffs*
26 *Additional Counsel on next page*

27 **UNITED STATES DISTRICT COURT**
28 **CENTRAL DISTRICT OF CALIFORNIA**

19 Ms. J.P., et al.,

20 Plaintiffs,

21 v.

22 WILLIAM P. BARR, et al.,

23 Defendants.

Case No. 2:18-cv-06081-JAK-SK

Assigned to the Hon. John A. Kronstadt
and the Hon. Steve Kim

24 **NOTICE OF MOTION AND**
25 **MOTION TO COMPEL**
26 **SUPPLEMENTAL DISCOVERY**
27 **RESPONSES AND FULL**
28 **PRODUCTION FROM**
29 **DEFENDANTS IN RESPONSE TO**
30 **PLAINTIFFS' FIRST SET OF**
31 **REQUESTS FOR PRODUCTION**

Date: February 5, 2020

Time: 10:00 a.m.

Place: Roybal Federal Building and
United States Courthouse

255 E. Temple Street
Courtroom 540
Los Angeles, CA 90012

Action Filed: July 12, 2018
Discovery Cutoff Date: October 5, 2020
Pretrial Conference: TBA
Trial Date: April 20, 2021

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1 Carter G. Phillips*
2 cphillips@sidley.com
3 Jennifer J. Clark*
4 jennifer.clark@sidley.com
5 SIDLEY AUSTIN LLP
6 1501 K Street, N.W.
7 Washington, D.C. 20005
8 Telephone: +1 202 736-8000
9 Facsimile: +1 202 736-8711

Mark E. Haddad (SBN 205945)
markhadd@usc.edu
Part-time Lecturer in Law
USC Gould School of Law**
University of Southern California
699 Exposition Blvd.
Los Angeles, CA 90089
Telephone: +1 213 675-5957

8 Michael Andolina*
9 mandolina@sidley.com
10 Timothy Payne*
11 tpayne@sidley.com
12 Kevin Fee*
13 kfee@sidley.com
14 Daniel Craig*
15 dcraig@sidley.com
16 SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
Telephone: +1 312 853-7000
Facsimile: +1 312 853-7036

Luis Cortes Romero (SBN 310852)
lcortes@ia-lc.com
Alma L. David (SBN 257676)
adavid@ia-lc.com
IMMIGRANT ADVOCACY &
LITIGATION CENTER, PLLC
19309 68th Avenue South, Suite R-102
Kent, WA 98032
Telephone: +1 253 872-4730
Facsimile: +1 253 237-1591

17 Sean A. Commons (SBN 217603)
18 scommons@sidley.com
19 SIDLEY AUSTIN LLP
20 555 West Fifth Street
21 Los Angeles, CA 90013
22 Telephone: +1 213 896-6000
Facsimile: +1 213 896-6600

23 *Admitted pro hac vice

24 ** Institution listed for identification purposes only

1 PLEASE TAKE NOTICE that on February 5, 2020 at 10:00 a.m., or as soon
2 thereafter as the matter may be heard, in the above-mentioned court at Roybal Federal
3 Building and United States Courthouse, 255 East Temple Street, Los Angeles, CA,
4 90012, Courtroom 540, before the Honorable Steve Kim, Plaintiffs Ms. J.P., Ms. J.O.,
5 and Ms. R.M., on behalf of themselves and all others similarly situated (“Plaintiffs”)
6 will and hereby do respectfully move for an order to compel Defendants William P.
7 Barr, Kevin K. McAleenan,¹ the Department of Homeland Security, United States
8 Immigration and Customs Enforcement, United States Customs and Border
9 Protection, Alex M. Azar II, the Department of Health and Human Services, Jonathan
10 H. Hayes, Office of Refugee Resettlement, David Marin, Lisa Von Nordheim, Marc
11 Moore, and Lowell Clark (collectively “Defendants”) to supplement their responses
12 and produce all documents that are responsive to Document Request Nos. 1-16 in
13 Plaintiffs’ First Set of Requests for Production to Defendants (“Document
14 Requests”).²

15 As explained more fully in the Joint Stipulation and Declaration of Kevin M.
16 Fee filed concurrently herewith, the parties met and conferred prior to the filing of this
17 motion pursuant to Local Rule 37 and Federal Rule of Civil Procedure 37 but were
18 unable to resolve their dispute and thus require the Court’s assistance. *See* Fee Decl.,
19 filed concurrently herewith. This Motion is based upon this Notice of Motion, the
20 Joint Stipulation of Plaintiffs and Defendants pursuant to Local Rule 37-2, the
21 declarations of counsel filed herewith, all pleadings and papers on file in this action,

22 ///

23 ///

24 _____

25 ¹ Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Acting Secretary of
26 Homeland Security Chad F. Wolf is substituted for the former Acting Secretary Kevin
27 K. McAleenan.

28 ² These are filed as Exhibit C to the Declaration of Kevin M. Fee in Support of
Plaintiffs’ Motion to Compel (“Fee Decl.”), filed concurrently herewith.

1 and upon other such evidence and argument as may be presented to the Court at or
2 before hearing on this Motion.

3 Date: January 15, 2020

4 SIDLEY AUSTIN LLP

5 By: /s/ Amy P. Lally

6 Amy P. Lally

7 Ellyce R. Cooper

Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1999 Avenue of the Stars, 17th Floor, Los Angeles, California 90067.

On January 15, 2019, I served the foregoing document(s) described as
**NOTICE OF MOTION AND MOTION TO COMPEL SUPPLEMENTAL
DISCOVERY RESPONSES AND FULL PRODUCTION FROM
DEFENDANTS IN RESPONSE TO PLAINTIFFS' FIRST SET OF REQUESTS
FOR PRODUCTION** on all interested parties in this action by the method described
below:

I electronically filed the foregoing with the Clerk of District Court using its CM/ECF system, which electronically provides notice.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Amy P. Lally
Amy P. Lally
Attorney for Plaintiffs